

# The Limpsfield Trust

## Privacy Policy

### Introduction

The Limpsfield Trust is dependent on the generosity, goodwill and faithfulness of individuals and churches to meet our charitable objectives. Building and maintaining truly mutual and fruitful relationships is central to our identity and we are committed to transparent, ethical and honest communication.

If you are unhappy with our work, whether that is about your data or anything else, please do not hesitate to contact us at [limpsfield.1962@gmail.com](mailto:limpsfield.1962@gmail.com) or write to us at 48 Rayleigh Road, Stanford-le-Hope, Essex, SS17 ONE.

If you use our website or any of our services or provide us with any personal information, we will point you toward this policy, so that you can be fully aware of how information about you might be used and disclosed.

### What is personal data?

Personal data covers any information that enables us to identify you as an individual. This information could include, name, address, telephone number, e-mail address, date of birth, credit card details or bank details (submitted when making a donation).

### Where do we collect personal data?

We only ever collect information we need to do our work, including data that helps us to improve what we do and how we do it. There are a number of places we collect data from these are:

- **Information you give us directly:** We gather this information through specific activities, for example when you complete printed forms, telephone us or complete on-line forms on our website.
- **Information you give us indirectly:** For example, when you give your data to third party websites, such as JustGiving or Give.net
- **Information we collect from your use of our website:** This information is collected using cookies which helps us understand what information people are finding most valuable and then make improvements to our websites.
- **Information from third parties:** For example, we may receive information about you from a friend who books you onto an event or makes a donation in your name.
- **Information from public sources:** We may combine information you have provided us with information from public sources. This helps us to get a better understanding of who our supporters are, and ensure we engage with you more effectively. This saves time and resources and helps ensure we are as cost effective as possible. We may also use publically available information to ensure we comply with regulations regarding money laundering.

We also make every effort to avoid collecting data from people under 16 years of age except where linked to our direct charitable purposes.

### **Sensitive Categories of Data**

Data protection law recognises that certain categories of personal information are more sensitive than others, such as ethnicity, political opinions or health issues. We do not collect sensitive information unless there is a clear reason for doing so, such as your involvement in an event where knowing this information improves your safety and helps with your engagement. You may disclose sensitive information to a member of staff for prayer, and they may take a temporary note as a reminder. When we collect this data we will make it very clear why we are doing so and what our legitimate interests, or other legal grounds, are for doing so.

### **Use of Cookies**

At present we are only using cookies to receive information from 'Google Analytics'. These collect anonymous data so we can see how popular our site is and what people are interested in looking at.

### **How do we use personal data?**

We use personal data in a variety of ways, such as sending you our newsletters, to process event bookings, to provide you with information you have requested, to record any contact we have had with you, or to write to you as a supporter of The Limpsfield Trust. All information that we hold concerning you will be held and processed by the Limpsfield Trust in accordance with the provisions of data protection legislation.

We will respect your preferences to be included or not be included in email mailings and postal mailings. Please do use the options within the emails to unsubscribe or contact us at [limpsfield.1962@gmail.com](mailto:limpsfield.1962@gmail.com) or write to us at 48 Rayleigh Road, Stanford-le-Hope, Essex, SS17 0NE.

We will also respect your preference for your photo not to appear in The Limpsfield Trust publications - please contact us to express this preference.

Please be especially assured, **we will not transfer your contact details to other charities or companies for their marketing purposes.**

### **When we share your data, and who we share it with.**

Except as listed immediately below, we will not, without your consent, supply your contact details or other personal data to any third party outside The Limpsfield Trust.

We may share your data where it is necessary to do so to undertake our charitable activities. We may, for example:

- transfer your name and address to a mailing house in order to send out mailings to you
- transfer your contact details to our email platform provider in order to send out tailored emails to you
- transfer your name, address and the values of gifts that you have given us to HMRC in order to reclaim gift aid on your gifts
- transfer your name and contact details to conference centres if you are a supporter attending a Limpsfield Trust sponsored conference or event
- in the event of any of your children attending Haslemere Ventures, transfer your name and contact details and the names, contact details, dates of birth, and any other relevant information relating to those children to the Church Pastoral Aid Society (registered charity number 1007820), the organisation that runs Haslemere Ventures.

## What is our legal basis for processing your data?

Within GDPR there are six legal bases for processing data and we rely on the following bases to process your data:

- We rely on **legitimate interest** for a variety of purposes including posting you our newsletters and invitations to financially support our work, undertaking desk research and writing to thank you for your donations.
- We use **consent** to contact you by email or phone, which means we cannot contact you in these ways without your explicit consent. Every generic email you receive provides a clear and simple way to opt out, or unsubscribe, from future emails.
- We use **legal obligation** as the basis for processing any legally required activities such as Gift Aid returns to HMRC.

It is that area of **Legitimate Interest** that might be of greatest interest to you. Legitimate Interest is about balancing the interests of The Limpsfield Trust against your interests, rights and freedoms, and having careful and close regard to any reasonable expectations you might have about the use of your data. We make legitimate interest assessments when deciding what activities fall within this basis for processing your data.

## Who has access to your information, and how is it kept safe?

We maintain a high level of security in relation to your data. All staff and volunteers of The Limpsfield Trust undertake data protection training. We place a high value on ensuring personal data of any kind is kept securely. In accordance with our data protection policy, we report to our Trustees any breach of the data protection policy, for accountability, monitoring and improvement.

Although the vast majority of data is kept within the EU, sometime it is necessary to send your data outside the European Economic Area (EEA). For example, on occasion we may share your data with a supplier who then holds this data on a server outside the EEA. By submitting your data to us you agree to this transfer, storing or processing at a location outside the EEA.

However, we will endeavour to ensure that your privacy is protected as outlined in this privacy policy and in accordance with our legal obligations under data protection legislation.

## How long do we keep your data for?

We will hold your personal information on our system for as long as it is needed to fulfil the function for which we hold the data, or for as long as is required by law for the relevant activity. For more details of this please do look at our data retention policy detailed at the end of this document.

## Contacting us regarding your personal data

As an individual, you have a right under data protection legislation to obtain information from us, including a description of the data that we hold on you. You also have the right to amend or update the information we hold about you, change your communication preferences, withdraw your consent to use your personal information (where we have used consent as the legal basis for processing), and make other changes to what data we hold on you. You can contact us at [limpsfield.1962@gmail.com](mailto:limpsfield.1962@gmail.com) or write to us at 48 Rayleigh Road, Stanford-le-Hope, Essex, SS17 0NE.

## **The Limpsfield Trust Data Retention Policy**

These are the different types of personal data held by The Limpsfield Trust. We will retain this personal data for the periods outlined below:

### **Individual donors**

We will remove your record 15 years after the date of your last gift to The Limpsfield Trust.

### **Leaders of churches and other organisations who support The Limpsfield Trust**

We do not hold details for you as an individual supporter but as a contact/representative for the organisation we are partnering with. When the partnership ends or you cease to be part of a supporting organisation we will delete your data.

### **Legacy Cases**

Pecuniary files – these will be archived for seven years and then securely destroyed after the retention period expires.

Residuary files – these will be archived for 15 years and then securely destroyed.

All legacy files where The Limpsfield Trust has entered into a deed of indemnity will be kept for a period of 50 years.

### **Staff**

After your service is ended, employment records (including data submitted to HMRC) will be retained for 10 years.

### **Volunteers (including Leaders at Haslemere Ventures and earlier venues)**

After your last day of volunteering, we will retain your personal details as part of our individual supporters' programme for 15 years.

### **Unsuccessful job applicants**

If you apply for a post with The Limpsfield Trust but are unsuccessful, we will delete your data six months after you apply for the post.

An individual data subject will often fall into one or more of the above categories. In these instances, we will retain data for the longest time indicated in the applicable retention period. They will then be securely destroyed.

### **Changes to The Limpsfield Trust data retention policy**

This Data Retention Policy may be updated from time to time so you may wish to check it each time you submit personal information to The Limpsfield Trust.